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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TIMOTHY TALAMANTE,
Plaintiff,
vs.
CHRIS PIAETE, *et al.*,
Defendants.

Case No. 3:24-cv-00509-ART-CLB

**INTERESTED PARTY NEVADA
DEPARTMENT OF CORRECTIONS
MOTION FOR EXTENSION OF TIME
TO FILE SUPPLEMENTAL
BRIEFING
(ECF No. 18)**

Interested Party, Nevada Department of Corrections, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Douglas R. Rands, Senior Deputy Attorney General, hereby submit a Motion for Extension of Time to File Supplemental Briefing in this matter. This Motion is based on Federal Rule of Civil Procedure 6(b)(1)(A), the following Memorandum of Points and Authorities, and all papers and pleadings on file in this action.

MEMORANDUM OF POINTS AND AUTHORITIES

I. ARGUMENT

The Interested Party respectfully requests a ten (10) day extension of time out from the current deadline (April 9, 2025) to file supplemental briefing in this case. Counsel for the Interested Party has begun gathering the evidence necessary to respond to the issues presented. However, Counsel for the Interested Party has a pre-planned out of town commitment during the week of April 7, 2025. Counsel has agreed to be one of the judges

1 of the National Finals of the High School "We the People" competition. This is a high
 2 school constitutional competition, with high schools around the country competing. In
 3 order to judge the competition, Counsel will have to spend the week in Washington DC.
 4 Therefore, it will be difficult to file the supplemental briefing in the current schedule.

5 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as
 6 follows:

7 When an act may or must be done within a specified time, the
 8 court may, for good cause, extend the time: (A) with or without
 9 motion or notice if the court acts, or if a request is made, before
 10 the original time or its extension expires; or (B) on motion made
 after the time has expired if the party failed to act because of
 excusable neglect.

11 The Interested Party's request is timely, and its limited nature will not hinder or
 12 prejudice Plaintiff's case but will allow for a thorough response to the pending motion.
 13 The requested ten (10) day extension of time should permit Counsel to gather the
 14 remaining evidence and properly supplement the pleadings.

15 For these reasons, the Interested Party respectfully requests a ten (10) day
 16 extension of time from the current deadline to file a joint pretrial order in this case, with
 17 a new deadline to and including **Monday, April 21, 2025**.

18 DATED this 3rd day of April, 2025.

19 AARON D. FORD
 20 Attorney General

21 By: /s/ Douglas R. Rands
 22 DOUGLAS R. RANDS, Bar No. 3572
 23 Senior Deputy Attorney General

24 *Attorneys for Interested Party*

25 **ORDER**

26 **IT IS SO ORDERED.**

27 **DATED:** April 3, 2025

28 
 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on April 3, 2025, I electronically filed the foregoing, **INTERESTED PARTY NEVADA DEPARTMENT OF CORRECTIONS MOTION FOR EXTENSION OF TIME TO FILE SUPPLEMENTAL BRIEFING (ECF No. 18)**, via this Court's electronic filing system. Parties that are registered with this Court's electronic filing system will be served electronically. For those parties not registered, service was made by depositing a copy for mailing in the United States Mail, first-class postage prepaid, at Carson City, Nevada, addressed to the following:

Timothy Talamante #54405
Northern Nevada Correctional Center
Post Office Box 7000
Carson City, NV 89702

An employee of the
Office of the Nevada Attorney General